

Affidavit

County of Lorain

SS:

State of Ohio

Now comes the undersigned, Jonathan E. Rosenbaum, who being duly sworn states as follows:

1. The following is a true and accurate record of my time spent in and expenses incurred in prosecuting Jane Doe, et al v. Boland, USDCt ND Ohio Case No. 1:07cv2787:

Time and Expenses

Client Bloom Rate \$200.00

Date	Activity/ Expense	Time/Amount
	Background investigation re Boland	0.75
9-1-06	Attempt FOIA	1.25
	Obtain and Read SW, Diversion Agreement	2.0
9-9-07	Res re Priv. and Cause of Action	3.25
9-10-07	Res and Draft complaint;	7.0
9-11-07	Research (computer and law library) and draft federal complaint	2.5
9-13-07	Prepare Summons, Case Desig Form, File lawsuit	1.5
10-21-07	Download and read Comp res re state of limitation; print out Motion to Dis	
	And Exs; Res rules regarding time for reply	3.25
10-24-07	Computer and library research for Br In Opp	3.75
10-25-07	Draft Br in Opp	8.0
10-26-07	Edit and Proof Br in Opp; Res	3.75
12-17-07	Speak with Istock Atty	0.25
12-19-07	Prepare Initial Disc Disclosure; Speak with Deft	1.5
12-21-07	Receive Third Party Complaint and Ans w/ cc; Computer Res re dismissal	1.25
12-23-07	Complete initial disclosure and est. costs and fees	4.0
12-26-07	Speak to Deft re planning order; Work on Motion to Dismiss; Draft Planning Meeting Report	8.0
12-27-07	Finalize and serve Motion to Dismiss	5.25
1-3-08	Finalize and send Planning Meeting Report with letter	0.50
3-3-08	Meet with S/A Sullivan and review images 1/2 travel time	1.75
3-4-08	Work on Disc Req to Deft; Review Docs and filings	5.0
3-5-08	Finalize Disc Req; Not of Serv; File and Serve	1.25
4-29-08	Read Emails re Discovery Response from Deft; Draft and file Notice of Deemed Admissions and Exhibits	2.25
4-30-08	Draft and send R37 letter; issue and serve 23 subs	6.5
5-2-08	Read disc Response; Draft, Research, File Br in Opp to Mot to w/d	

	Deemed Admissions	3.25
5-5-08	Draft and email proposed joint SC report; Remind Clients of SC	1.0
5-12-08	Attend SC; Meet with clients Travel 60 mi	1.75
5-18-08	Review Court rulings and entries after download; Email Correspondence with Judge Pike and Atty Clark; Letter to Porage County Prose office	1.25
6-12-08	Travel to Cleveland (1/2 time) meet with SA Sullivan; review discovery	1.5
7-9-08	Travel to Cleveland to meet with SA Sullivan to open disc	1.5
7-10-08	Travel to Cleve for Sc; Attend SC; Meet with Clients, Speakd with SA Sullivan; Darftsub ltr to USA off and FBI; Draft Sub; mail	3.25
7-17-08	Draft Res to Motion to strike	3.5
7-17-08	Rework Motion to Strike Res and file , Create Affidavits; Call Hamilton County PO and Ok USAO; create and serve 2 subs	6.0
7-23-08	Travel to FBI to Prepare for Depo and surrender Summit County CD	3.25
7-28-08	Prepare for depo	6.25
7-29-08	Attend Depo of Deft	5.5
8-13-08	Draft serve and file Mot to Compel	1.0
8-20-08	Email Correspondence with Deft; res and prepare Aff Affecting Real Estate	1.25
8-21-08	Travel to Cleveland and File aff affecting Real Estate	1.75
	Attend and prepare for Depos of adult Plaintiffs	2.0
4-21-09	Draft Mot for SJ	1.75
4-22-09	Draft Mot for SJ	4.0
4-23-09	Finalize Mot for SJ	3.5
4-29-09	Draft res to Mot for Protective Order. Work on Br in Opp to D's Mot for SJ	6.5
5-1-09	Brief in Opp to Deft's Mot for SJ	6.0
5-4-09	Prof and file Br in Opp to Deft's Mot for SJ	3.0
6-3-09	Research Deft's website; Draft and file Not of Supp Auth/Evid	2.0
6-8-09	Draft an File Br in Opp to Mot to Strike; Check Deft's Website	1.5
9-14-09	Prepare and file app docs	2.5
12-14-09	Draft and res App Br	4.5
12-15-09	Draft Br.	6.5
12-16-07	Draft and Prof Br and appendix	3.5
12-17-09	Proof and file Br and App.	3.0
1-20-10	Draft Reply brief; Read Appee brief	2.25
1-21-10	Work on Reply Br	0.75
2-1-10	Proof and File Reply Br	2.25
5-12-10	Draft and file Not of Supp Auth, Res finding case	1.75
8-11-10	Comp Res re Boland: Read US v. Paull	0.5
11-19-10	Read US Brief	0.25
11-29-10	Read Boland Reply Br	0.5
11-30-10	Draft an file OA Acknowledgement	0.25
12-3-10	prepare for argument	6.0
12-5-10	Work on outline at home	1.25
12-7-10	Prepare for argument	2.25
12-8-10	Attend and prepare for C of A argument. Confer with DOJ	11.5
	Telephone Pt	.25
4-28-11	Telephone Pt	.25

5-3-11	Draft and file Motion to Strike; computer res	1.75
5-12-11	Computer Res re: Morphing and damages	2.5
7-11-11	Draft Res to Deft's 2 nd Mot for SJ	4.5
7-12-11	Proof and finalize brief	<u>3.5</u>
		208.5

Payments and Expenses

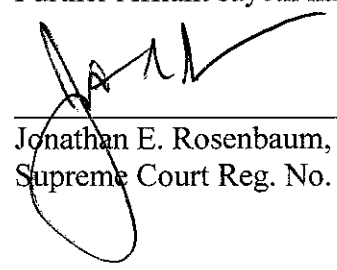
3-17-06	Travel to USA Office 60 mi plus \$5.00 parking	
9-13-07	Filing Fee	\$350.00
1-11-08	60mi and parking	\$7.00
3-3-08	30mi (1/2) travel	
5-1-08	CM for Subs	\$119.83
5-12-08	Parking \$6.00 60mi	
6-12-08	30 mi	
7-9-08	60 mi	
7-10-08	60 mi and \$6.00 parking	
7-18-08	CM to Boeing and Tulsa	\$10.98
7-23-08	60 mi	
7-29-08	60mi and \$6.00 parking	
8-15-08	M&H	\$272.00
8-21-08	Recording Fee \$60.00, parking \$2.25, 60 mi	
9-14-09	App filing fee	\$455.00
12-8-10	465 mi, \$11.00 parking (receipt on Discover)	

2. \$200.00 per hour has been my usual and customary hourly rate for the past several years; and

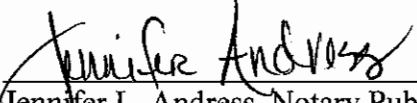
3. \$200.00 per hour is a reasonable fee for legal services in Lorain County, Ohio;

4. The attorney's fees in this matter accrued to date total \$41,700.00 and the expenses total \$1,514.11

Further Affiant sayeth naught.


Jonathan E. Rosenbaum, Attorney
Supreme Court Reg. No. 0021698

Sworn to and subscribed before me this 13th day of July, 2011.


Jennifer L. Andress, Notary Public
My Commission Expires 03-27-13